IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

MATTHEW MCPHERSON	
on behalf of himself and all others	
similarly situated,) CASE NO. 1:14-cv-02475
)
Plaintiff,) JUDGE SOLOMON OLIVER, JR.
)
V.	
HORSESHOE CLEVELAND	
MANAGEMENT, LLC d/b/a	
HORSESHOE CASINO	
CLEVELAND,	
Defendant.)

MOTION FOR ADMISSION PRO HAC VICE OF ATTORNEY ALLISON V. SOMERS

Pursuant to Local Civil Rule 83.5(h), the undersigned attorney for Defendant Horseshoe Cleveland Management, LLC ("Defendant") respectfully requests that this Court permit Attorney Allison V. Somers to appear in this case *pro hac vice* as co-counsel of record for defendant. In support of this Motion for *pro hac vice* admission to the bar, defendant states as follows:

- 1. Allison V. Somers is an associate at the law firm of Akin Gump Strauss Hauer & Feld LLP. (The Affidavit of Allison V. Somers in Support of Motion to Admit *Pro Hac Vice* is attached hereto as Exhibit 1.)
 - 2. Ms. Somers is currently working with counsel for Defendant.

3. Ms. Somers is and has been a member in good standing of the Bar of the State of Virginia (Bar No. 85715) since October 2013 and the Bar of the District of Columbia (Bar No. 1023010) since October 2014; and the United States District Court for the District of Columbia since January 2015.

- 4. Ms. Somers is in good standing in all bars to which she has been admitted and she is not now, nor has she ever been, disbarred or suspended from practice before any court, department, bureau or commission of any State or the United States, nor has she ever received any reprimand from any such court, department, bureau or commission pertaining to conduct or fitness as a member of the bar.
- 5. Defendant is also represented in this action by the undersigned counsel, who is licensed to practice law (and in good standing) in Ohio and in the Northern District of Ohio.
- 6. Ms. Somers's office address, phone number and email address are as follows:

Allison V. Somers
AKIN GUMP STRAUSS HAUER & FELD LLP
1333 New Hampshire Avenue, NW
Washington, DC 20036-1564
(202) 887-4000
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WHEREFORE, the undersigned counsel respectfully requests that the Court rule upon this Motion with no hearing or further response and enter an Order (a) granting this Motion and (b) admitting Allison V. Somers to represent Defendant as co-counsel in this matter *pro hac vice*.

Respectfully submitted,

/s/ Ryan J. Morley

Ryan J. Morley (0077452) Alex R. Frondorf (0087071) LITTLER MENDELSON P.C. 1100 Superior Avenue, 20th Floor Cleveland, OH 44114 Telephone: (216) 696-7600

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Attorneys for Defendant HORSESHOE CLEVELAND MANAGEMENT, LLC

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2015, a copy of the foregoing *Motion* for Admission Pro Hac Vice of Attorney Allison V. Somers was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Ryan J. Morley Ryan J. Morley (0077452)

One of the Attorneys for Defendant